



*Consulting Engineers  
and Scientists*

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November 9, 2010  
(PBW Project No. 1584)

VIA FEDERAL EXPRESS

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6SF-AP)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: October 2010 Monthly Report for UAO and November 2010 Monthly Report for  
Settlement Agreement, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Engblom:

Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) and Section VIII, Paragraph 41.a of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement) for the above-referenced Site. As discussed in my telephone conversation with Mr. Miller on August 2, 2005, regarding the UAO, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. The Settlement Agreement requires submittal of a progress report by the 15<sup>th</sup> of every month.

In accordance with the UAO requirements for the RI/FS this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including: (1) performance of Baseline Ecological Risk Assessment (BERA) laboratory activities described in the BERA Work Plan & Sampling and Analysis Plan (WP-SAP); (2) submittal of the BERA 60-day

deliverable; and (3) preparation (but not submittal) of the Draft Preliminary Site Characterization Report (PSCR).

2. Results of RI/FS sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
  - Laboratory reports for BERA analytical and toxicity testing activities were received from the laboratory. These reports were transmitted to Mr. Miller with the BERA 60-day deliverable. An updated validated analytical database containing these data is provided to Mr. Miller in electronic form on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of RI/FS work – The following actions are planned for the next two months:
  - Submittal of the Draft PSCR;
  - Preparation and submittal of the Final PSCR, pending receipt of EPA comments on the Draft PSCR; and
  - Preparation of the Draft BERA Report.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

In accordance with the Settlement Agreement requirements, this report also addresses the topics listed below for the Removal Action:

1. Significant Removal Action developments during the preceding period, including actions performed and any problems encountered – The following actions were taken during the previous month:
  - Submittal of Settlement Agreement to contractor and subcontractor;
  - Preparation of a letter providing contractor/subcontractor qualifications, insurance certificates and policies, and notice of sample collection activity if necessary (this letter was submitted to you on November 2, 2010); and
  - Preparation for Removal Action field activities.
2. Removal Action analytical data received during the reporting period – No data were received during the previous month:
3. Removal Action developments anticipated during next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems – Field activities, including tank content removal and off-site disposal, are anticipated to be performed by the end of December. No problems are anticipated.

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Thank you for the opportunity to submit this monthly report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', with a long horizontal flourish extending to the right.

Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Ray Merrell – Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Donnie Belote - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP